



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

SANITARY LEGISLATION.

COURT DECISIONS.

RHODE ISLAND SUPREME COURT.

Workmen's Compensation Law—Accident due to Dizziness Resulting from Disease— Compensation Allowed.

CARROLL *v.* WHAT CHEER STABLES CO., 96 Atl. Rep., 208. (Jan. 5, 1916.)

The petitioner, William Carroll, had been employed by the What Cheer Stables Co. as a hack driver for about five years. He was suffering from "hernia, hardening of the arteries, and Bright's disease." On December 1, 1914, while driving a hack, he had an attack of "dizziness or unconsciousness," fell from his seat, and was seriously injured.

One witness testified that "the horses ran against the curbstone and he fell off head first," but the court found that the fall was probably "due to dizziness or unconsciousness induced by a disease from which he was suffering."

The court decided (Mr. Justice Vincent dissenting) that the injury was caused by an accident "arising out of and in the course of his employment," and that the employee was entitled to compensation under the workmen's compensation law of Rhode Island.

NORTH CAROLINA SUPREME COURT.

County Health Officer—Compensation—In North Carolina Salaries Fixed by County Boards of Health Must be Approved by the County Commissioners.

HALFORD *v.* SENTER ET AL., 86 S. E. Rep., 525. (Oct. 6, 1915.)

The North Carolina law authorized the county board of health to fix the salary of the county superintendent of health, subject to the approval of the board of county commissioners. The board of health of Harnett County elected the plaintiff superintendent of health and fixed his salary at \$600 per annum.

The board of county commissioners refused to approve the salary for more than \$300 per annum. He brought suit for the salary of \$600. The court held that he could not recover more than \$300.

BROWN, J.: The agreed facts are that plaintiff was duly elected superintendent of health for Harnett County by the board of health of said county, and his compensation fixed by said board at the rate of \$600 per annum. Upon the presentation of plaintiff's claim, the matter being properly brought before the defendants, the board of commissioners of said county, they declined to audit and allow such expenditure, upon the ground that it was exorbitant and unreasonable. The defendants then authorized an expenditure of \$300 per annum for the services of plaintiff as superintendent of health.